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Mono Lake Committee
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Lester Snow
Executive Director
CalFed Bay/Delta Program
1416 - 9th Street
Suite 1135
Sacramento, CA 95814

Dear Lester,

On behalf of the Mono Lake Committee, I am writing in support of the EWC/CUWA certification plan, which has been proposed for CalFed's urban water conservation program.

I had the opportunity to sit on the CalFed panel in Fountain Valley representing the EWC, and it was very interesting to me to see those elements of the plan that concerned or frightened water wholesalers and retailers. All of their concerns must be addressed, but I remain convinced that the EWC/CUWA plan is the best plan to use. I am equally convinced that if the Kern/Bear Valley alternative is used as a base, it will undermine the built-in trust you are getting with the EWC/CUWA consensus document.

Our comments on the key issues are as follows:

- There is uncertainty associated with including an environment benefit and cost analysis in the implementation review. The EWC/CUWA proposal does not resolve that uncertainty, but I understand there is work going on now to produce a surrogate value that could be used. While agreeing on a final number will not be easy, the path to it is straight forward, and the EWC members of CUWCC do not want this issue to be moved to a second tier. It lies at the heart of the CalFed process--the environment IS a central factor and must be valued.
- The primary wholesalers may not want to play a leadership role in promoting water conservation, particularly when it may affect their bottom line, but their leadership is extremely important. In Southern California during the early 1990s, the Metropolitan Water District was very active in promoting water conservation among its member agencies. More recently, they have been less aggressive, and the result has been

lower expenditures both from MWD and from member agencies. We think it is wise to give additional incentives to wholesalers who take water directly from the Bay-Delta to encourage them to promote implementation of Best Management Practices among their members. All of California will benefit.

- There was a long discussion about non-profit organizations having the right to appeal certification of a conservation plan. This issue cut right to the heart of the trust issue. Those who negotiated the EWC/CUWA plan were able over time to work out enough safeguards to include this element in the plan. Let's not waste the time CUWCC members spent on this, and as the Kern/Bear Valley folks suggested in the reverse, make a change later if the EWC right to appeal is abused. In reality, I think an EWC appeal will be a rare event, and if it does happen, the panel review system will be in trouble.
- Finally, there was a very brief discussion about not cutting off CalFed "goodies" if a supplier is out of compliance for a long period of time. While the discussion on this was brief, I got the sense that this lies at the heart of the alternative proposal. This is the ultimate stick, and it should remain in place.

Thank you for placing a high priority on water efficiency. The Los Angeles Department of Water and Power's water efficiency program has been the key to having plenty of water to re-water Mono Lake, while supporting a strong Los Angeles economy. In 1998, Los Angeles was using the same amount of water it used in 1972, despite a 28% increase in the population. Yet, in the late 1980s, Los Angeles was sure they could not survive without Mono Basin water. Aggressive water conservation was a solution that was imposed on them, but Los Angeles is doing more, not less conservation. LADWP and the City Council just approved a low-flow toilet retrofit on resale ordinance for homes and apartments, and this law is expected to double the number of low-flow toilets being used in the city. We look forward to the time when, because of CalFed's program, all of the Bay-Delta users will be as proud of their conservation results as is LADWP and the Mono Lake Committee of theirs.

Sincerely,



Frances Spivy-Weber
Executive Director